

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Oral Argument Requested

**NOTICE OF DEFENDANTS' JOINT MOTION TO EXCLUDE  
THE OPINIONS OF STEPHEN LAGANA, M.D.**

**PLEASE TAKE NOTICE** that on January 18, 2022, or as soon as counsel may be heard, the undersigned Defense Executive Committee counsel, on behalf of all Defendants named in the operative Master Personal Injury Complaint (Dkt. [122](#)), the operative Consolidated Second Amended Economic Loss Class Action Complaint (Dkt. [398](#)), and the operative Consolidated Amended Medical Monitoring Class Action Complaint (Dkt. [123](#)) shall move for the entry of an Order excluding the opinions of Plaintiffs' expert, Stephen Lagana, M.D., pursuant to Federal Rules of Evidence 702, 403, and 104.

**PLEASE TAKE FURTHER NOTICE** that in support of its motion, the undersigned defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter; and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Dated: November 1, 2021

By: /s/ Seth A. Goldberg

Seth A. Goldberg, Esq.  
*Lead Counsel and Liaison  
Counsel for Defendants*

DUANE MORRIS LLP  
Seth A. Goldberg, *Lead Counsel and  
Liaison Counsel for Defendants*  
Jessica Priselac  
Lauren Appel  
Coleen W. Hill  
Melissa A. Ruth  
30 South 17th Street  
Philadelphia, Pennsylvania 19103  
Tel.: (215) 979-1000  
Fax: (215) 979-1020  
SAGoldberg@duanemorris.com  
JPriselac@duanemorris.com  
LAAppel@duanemorris.com  
CWHill@duanemorris.com  
MARuth@duanemorris.com

*Counsel for Zhejiang Huahai  
Pharmaceutical Co, Ltd.,  
Huahai U.S., Inc., Princeton  
Pharmaceutical Inc., and Solco  
Healthcare US, LLC*

GREENBERG TRAURIG, LLP  
Lori G. Cohen, *Lead Counsel for  
Defendants*  
Victoria Davis Lockard  
Steven M. Harkins

Terminus 200  
3333 Piedmont Road, N.E.,  
Suite 2500  
Atlanta, Georgia 30305  
(678) 553-2100  
(678) 553-2386 (facsimile)  
[CohenL@gtlaw.com](mailto:CohenL@gtlaw.com)  
[LockardV@gtlaw.com](mailto:LockardV@gtlaw.com)  
[HarkinsS@gtlaw.com](mailto:HarkinsS@gtlaw.com)

*Counsel for Teva  
Pharmaceuticals USA, Inc.,  
Teva Pharmaceutical  
Industries Ltd., Actavis  
Pharma, Inc., and Actavis LLC*

PIETRAGALLO GORDON ALFANO  
BOSICK & RASPANTI, LLP  
Clem C. Trischler  
Jason M. Reefer  
Frank H. Stoy  
38th Floor, One Oxford Centre  
Pittsburgh, Pennsylvania 15219  
Tel: (412) 263-2000  
Fax: (412) 263-2001  
[CCT@PIETRAGALLO.com](mailto:CCT@PIETRAGALLO.com)

*Counsel for Mylan  
Laboratories,  
Ltd. and Mylan  
Pharmaceuticals, Inc.*

BARNES & THORNBURG LLP  
Sarah E. Johnston, *Liaison Counsel for  
Retailer Defendants*  
Kara Kapke  
Kristen L. Richer  
2029 Century Park East, Suite 300  
Los Angeles, CA 90067  
Tel: (310) 284-3798

Fax: (310) 284-3894  
[Sarah.Johnston@btlaw.com](mailto:Sarah.Johnston@btlaw.com)  
[Kara.Kapke@btlaw.com](mailto:Kara.Kapke@btlaw.com)  
[Kristen.Richer@btlaw.com](mailto:Kristen.Richer@btlaw.com)

*Counsel for CVS Pharmacy, Inc.  
(incorrectly named as CVS  
Health Corporation)*

ULMER & BERNE LLP  
Jeffrey D. Geoppinger, *Liaison*  
*Counsel for Wholesaler Defendants*  
600 Vine Street, Suite 2800  
Cincinnati, OH 45202-2409  
Tel.: (513) 698-5038  
Fax: (513) 698-5039  
[jgeoppinger@ulmer.com](mailto:jgeoppinger@ulmer.com)

*Counsel for AmerisourceBergen  
Corporation*

DM1\12581889.1

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 1, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Seth A. Goldberg  
Seth A. Goldberg